## UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

UMG RECORDINGS, INC., et al.,	)
Plaintiffs,	)
vs.  GRANDE COMMUNICATIONS  NETWORKS LLC, and PATRIOT MEDIA  CONSULTING, LLC,	) ) No. 1:17-cv-00365-LY ) )
Defendants.	)

## STATUS OF RESPONSIVE DOCUMENTS

Pursuant to the Court's Order of August 16, 2018 (Dkt. 139), Grande Communications Networks LLC ("Grande") submits this notice regarding the status of its production responsive to Plaintiffs' Request for Production Nos. 37 and 39, and Interrogatory No. 7. Grande confirms that the documents it produced reflect all of the responsive records it is aware exist. Grande notified opposing counsel that it is possible (but not confirmed) that additional records may exist in tape backup. Grande does not know if such records exist or if the tape backups are capable of being loaded and searched for responsive documents, owing to the fact that the entire infrastructure on which those records were created no longer exists. The parties have agreed to continue to meet and confer regarding the need for Grande to continue investigating the existence of any additional responsive materials.

Dated: August 21, 2018.

By: /s/ Richard L. Brophy

Richard L. Brophy Zachary C. Howenstine Margaret R. Szewczyk Armstrong Teasdale LLP 7700 Forsyth Blvd., Suite 1800 St. Louis, Missouri 63105

Telephone: 314.621.5070 Fax: 314.621.5065

rbrophy@armstrongteasdale.com zhowenstine@armstrongteasdale.com mszewczyk@armstrongteasdale.com

Attorneys for Defendant GRANDE COMMUNICATIONS NETWORKS LLC

## **CERTIFICATE OF SERVICE**

The undersigned certifies that on August 21, 2018, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system pursuant to Local Rule CV-5(b)(1).

/s/ Richard L. Brophy
Richard L. Brophy